

**REMARKS/ARGUMENTS**

Prior to entry of this amendment, claims 1-46 were pending in the application. No claims have been amended, no claims have been canceled, and no new claims have been added herein. Therefore, claims 1-46 remain pending. Applicants respectfully request reconsideration of these claims for at least the reasons presented below.

**35 U.S.C. §102 Rejection, Val et al.**

The Office Action has rejected claims 1-45 under 35 U.S.C. §102(e) as being anticipated by the cited portions of U.S. Patent No. 6,968,503 to Chang et al. (hereinafter "Chang"). Applicant respectfully submits the following arguments pointing out significant differences between claims 1-45 submitted by the Applicant and Chang.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." MPEP 2131 citing *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). Applicants respectfully argue that Chang fails to disclose each and every claimed element. For example, Chang fails to disclose, either expressly or inherently, accessing a template that indicates parameters for defining workflows or creating a definition of a first workflow based on said template.

Chang "relates to an XML user interface used in a workflow server." (Col. 1, lines 8-9) Under Chang, "a workflow server system is provided which uses an XML namespace designed to execute various workflow server services." (Col. 1, lines 53-55) "The workflow server may include an XML Execution Engine, which uses the XML namespace to execute commands issued by the user from a web browser." (Col. 1, lines 55-57) "The Workflow Server passes a user command to an XML Execution Engine, accesses an XML namespace to determine how to execute said command, executes said command, accessing a database if necessary, and

returns an XML document back to user for display on the user's web browser, said XML document containing a reference to an XSL file." (Col. 1, lines 61-67)

That is, Chang teaches a set of tags that extend XML to allow a user to enter through a browser a set of commands for interacting with a workflow server. (Col. 4, lines 5-8, lines 25-28, and lines 37-40) However, Chang does not disclose either expressly or inherently, accessing a template that indicates parameters for defining workflows or creating a definition of a first workflow based on said template. Rather, the workflows executed by the workflow server are defined by the commands entered by the user. Chang mentions the word "template" and provides a tag which "returns template related information." (Col. 21, lines 59-67) However, the templates referred to in Chang are XSL templates (col. 6, lines 1-5) for identifying a stylesheet to be used to display the workflow results to the requesting user via his browser (col. 3, line 62 - col. 4, line 4). Chang's "TEMPLATE-TAG" does not relate to a template that indicates parameters for defining workflows.

Claim 1, upon which claims 2-21 and 40-46 depend, claim 22, upon which claims 23-32 depend, and claim 33, upon which claims 34-39 depend, each recite in part "accessing a template that indicates parameters for defining workflows [and] creating a definition of a first workflow for managing at least one identity of at least one entity, based on said template." Chang does not disclose, either expressly or inherently, accessing a template that indicates parameters for defining workflows or creating a definition of a first workflow based on said template. Rather, Chang teaches a set of XML tags that allow a user to enter a set of commands for interacting with a workflow server. The templates referred to in Chang are XSL templates for identifying a stylesheet to be used to display the workflow results, not for indicating parameters for defining workflows. For at least these reasons, Applicants respectfully request that the rejections be withdrawn and claims 1-45 be allowed.

**35 U.S.C. §103 Rejection, Chang in view of Mein**

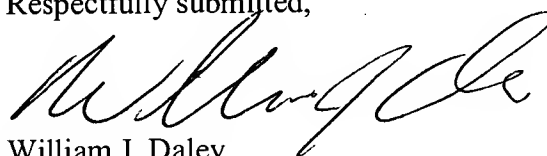
The Office Action also rejected claim 46 under 35 U.S.C. §103(a) as being unpatentable over Chang in view of U.S. Patent No. 6,457,066 to Mein et al. (hereinafter "Mein"). This rejection is respectfully traversed for at least the reason that claim 46 depends upon an allowable base claim as discussed above with reference to claim 1. For at least these reasons, Applicants respectfully request that the rejection be withdrawn and claim 46 be allowed.

**CONCLUSION**

In view of the foregoing, the applicant believes all claims now pending in this application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Respectfully submitted,



William J. Daley  
Reg. No. 52,471

TOWNSEND and TOWNSEND and CREW LLP  
Two Embarcadero Center, Eighth Floor  
San Francisco, California 94111-3834  
Tel: 303-571-4000 (Denver)  
Fax: 303-571-4321 (Denver)

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